

Interactive Brokers Group

Vendor Code of Conduct

Article I. Purpose and Scope

Interactive Brokers Group (IBKR) believes in operating its business in a responsible and ethical manner. IBKR has adopted this Vendor Code of Conduct (Code) to encourage its vendors to share in this commitment. The Code applies to companies, partnerships, and individuals supplying goods and/or services to IBKR (collectively “vendors”). It serves as a commitment to sustainable and ethical practices through IBKR’s supply chain. IBKR may revise this Code from time to time.

Article II. Overriding Principles

IBKR expects all vendors to conduct themselves responsibly and ethically in all business dealings and interactions. Vendors must comply with all applicable legal requirements.

Section 2.01 Anti-Bribery & Anti-Corruption

IBKR does not tolerate bribery or corruption involving its business, people, vendors, or other business partners in any manner. Vendors are required to fully comply with applicable legal requirements (i) designed to prevent bribery and corruption and (ii) that prohibit anti-competitive and anti-trust practices, including fixing prices, colluding, or rigging bids with competitors, allocating customers or markets with competitors, or exchanging any pricing information with its competitors. This may include compliance with the Bribery Act 2010 (United Kingdom) and the Foreign Corrupt Practices Act (FCPA) (United States) even if goods and/or services are provided outside the UK or the US. Vendors are prohibited from making inappropriate “facilitation payments” to public officials as provided in the FCPA.

Vendors will ensure that management systems and practices are in place to ensure the prevention of money laundering, insider trading, conflicts of interest, and fraud.

Section 2.02 Gifts and Conflicts of Interests

Vendors must avoid improprieties and conflicts of interest or the appearance of either in their business practices with IBKR. Vendors should not offer or provide lavish or otherwise inappropriate gifts, fees, favors, other compensation, including travel and entertainment, that are intended to influence, or could appear to influence, an IBKR business decision or provide an improper advantage for or from IBKR.

Section 2.03 Commitment to Responsible Contracting

Vendors are expected to apply the principles of the Code to themselves and their own suppliers. This means that they should, as appropriate, have their own responsible procurement policy and related vendor code of conduct.

Article III. Underrepresented Communities

IBKR is committed to providing contracting opportunities to all businesses, including businesses owned by members of underrepresented or disadvantaged communities. IBKR expects its vendors to make good faith efforts to provide the same opportunities to its suppliers and subcontractors that service IBKR.

Article IV. Environmental Stewardship

Vendors must comply with all applicable environmental legal requirements and should be able to demonstrate their compliance with appropriate documentation. In addition to compliance with laws, IBKR encourages its vendors to adopt Greenhouse Gas (GHG), water and waste management and similar programs for sustainable business practices.

IBKR encourages its vendors to exercise discipline in avoiding excess use of resources and to adopt best practices to prevent unnecessary impacts to the environment, including reuse of resources, recycling resources and reducing their use.

Article V. Human Rights and Labor Standards

IBKR values the importance of its employees and contractors and expects its vendors to share in this commitment. Vendors are expected to create a work environment where its employees are treated with respect and dignity and no retaliation occurs when good faith business concerns are raised.

Vendors must comply with all applicable legal requirements in their employment and contracting of their staff (including requirements related to anti-slavery, forced labor and human trafficking). Vendors will not under any circumstance (directly, indirectly or by silent acquiescence) (i) use unlawful child labor in their business and must adhere to all legal requirements regarding the employment of individuals under an applicable legal minimum age or (ii) use any form of labor exploitation practices such as involuntary or forced labor, including the inability for workers to exit employment per their own decision on reasonable notice. In addition, vendors will uphold the ILO Convention 138 on the Minimum Age for Admission to Employment, and Convention 182 on the Elimination of the Worst Forms of Child Labor in their employment practices.

Vendors should pay wages and benefits that meet or exceed the requirements of local law, individual employment contracts and/or any applicable collective bargaining agreement. Workers should not be required to work more than the relevant legal limits.

Vendors are required to provide their employees with access to equal opportunities without unlawful discrimination, bullying, or harassment. As required by applicable law, vendors must not discriminate based on gender, disability, age, ethnicity, sexual orientation, religious or cultural affiliation, and/or other applicable classification protected by law. Formal disciplinary and grievance appeal procedures are expected to be clearly documented and communicated to all employees. These requirements should apply in all hiring and employment practices. Vendors are expected to respect employees' rights for freedom of association.

Vendors are required to, and will require their subcontractors to, comply with all applicable health and safety laws and regulations in the jurisdictions in which they operate. Vendors must provide their employees a safe and healthy working environment, including adequate fire safety and prevention systems.

Vendors contracting with specific IBKR affiliates may, in addition, be required to evidence their compliance with country specific laws, such as the Modern Slavery Act 2015 (United Kingdom) as applicable.

Article VI. Privacy and Data Protection

Vendors must comply with all applicable privacy, data protection and information security legal requirements. Vendors must adopt and maintain processes to provide reasonable protections for personal, proprietary, and confidential information, including information that they access, receive or process on behalf of IBKR. Vendors must respect and maintain the confidentiality of all non-public information about IBKR, or its activities and all non-public information obtained in the performance of the vendor's duties about IBKR's customers, clients or third parties.

Article VII. Compliance, Monitoring, and Business Continuity

IBKR is a regulated business and a publicly-traded company. During our course of dealing, a vendor, its employees or its sub-contractors could learn material nonpublic information regarding IBKR; the trading on which may be prohibited by law. Vendors are expected to only disclose non-public information about IBKR to employees or contractors with a valid business reason to know and who are obligated to protect the confidentiality of such information and have policies in place to prevent unlawful trading.

Additionally, as a regulated business, IBKR reserves the right to (and vendors should expect IBKR will) monitor, record and disclose any data or communications created, sent, received, or stored using IBKR resources as it deems appropriate, subject to applicable legal requirements.

Section 7.01 Compliance

Vendors are expected to create and retain accurate and reasonable data evidencing their compliance with the Code and their other sustainability practices. By providing goods and/or services to IBKR, vendors agree to use commercially reasonable efforts to timely respond to inquiries and provide supporting data as reasonably requested by IBKR related to vendors' sustainability commitments and ethical practices. IBKR may seek evidence of compliance with the Code and carry out site audits with reasonable notice to verify adherence to the standards set out in this Code.

Section 7.02 Business Continuity

IBKR expects its vendors to develop procedures to manage business continuity risk and ensure continuous availability of critical services to IBKR during a disaster event. Vendors are expected to have plans in place for their business to continue with minimal interruption in the event of an emergency, crisis, natural disaster or terrorist/security related event. Vendors are expected to share these plans upon request.

Article VIII. Limitations, Remedies and Reporting

Section 8.01 Intellectual Property

Vendors may not use the Interactive Brokers' name, logo, trademarks or any other IBKR intellectual property without the express written permission of IBKR. Vendors will not refer to IBKR in their marketing or promotional materials in any way or in any medium, including but not limited to digital, print, social or other forms of media, for any reason without IBKR's prior written consent.

Section 8.02 Remedies

The contents of this Code do not in any way affect or prejudice any of IBKR's or its affiliates' rights and remedies under the relevant contracts with each vendor, if any. This Code may be incorporated into IBKR's standard terms and conditions for contracting, and IBKR reserves the right to terminate its relationship with vendors that fail to comply with the Code.

The failure or omission by IBKR to insist upon strict performance and compliance with any of the provisions of this Code at any time will in no way constitute a waiver of any of its rights. In the event of any conflict or ambiguity between any provision of this Code and the provisions of any relevant contract with any vendor, the provisions of that contract will prevail.

Section 8.03 Reporting

IBKR provides its employees, vendors, and the public with channels through which concerns about its business practices can be raised without reprisal. If a vendor or its employees encounter what is believed to be any potential concern, including a violation of legal requirements, this Code, or unethical behavior, such concern may be reported via the IBKR Hotline. Retaliation of any kind against an individual who reports concerns in good faith violates IBKR's principles and will not be tolerated.

The IBKR reporting hotline: 1 (888) 258-0133 or visit www.ethicspoint.com to submit a report online.